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ATTORNEYS FOR NHENTAI.NET

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PCR DISTRIBUTING CO., a company
organized under the laws of California,

Case No. 2:24-mc-07453-FLA-AJR

Plaintiff

vs.

JOHN DOES 1-20 d/b/a
NHENTAI.NET,

**DECLARATION OF JENNIFER M.
RYNELL IN SUPPORT OF
NHENTAI.NET'S MOTION TO
DISMISS (FED. R. CIV. P. 12(b)(6))
AND STRIKE (FED. R. CIV. P.
12(f))**

Defendants

Date: February 7, 2025; 1:30 p.m.
Place: Roybal Federal Building and
U. S. Courthouse, Courtroom 6B,
6th Floor, 255 E. Temple Street
Los Angeles, California 90012
Honorable Judge Fernando L. Aenlle-
Rocha

1 I, Jennifer M. Rynell, hereby state and declare as follows:

2 1. I am a partner in the law firm of Wilson Whitaker Rynell in Dallas,
3 Texas and one of the attorneys for Nhentai.net admitted *pro hac vice* in the above-
4 referenced matter. I have personal knowledge of the facts stated herein.

5 2. I provide this declaration in support of Nhentai.net's ("Nhentai.net")
6 Motions to Dismiss and/or Strike.

7 3. Attached as **Exhibit A** is a true and correct copy of the Copyright Office
8 catalog printout for Copyright No. TX0009380863.

9 4. Attached as **Exhibit B** is a true and correct copy of the Copyright Office
10 catalog printout for Copyright No. TX0009312666.

11 5. Attached as **Exhibit C** is a true and correct copy of the Copyright Office
12 catalog printout for Copyright No. TXu002409564.

13 6. Attached as **Exhibit D** is a true and correct copy of the Copyright Office
14 catalog printout for Copyright No. TXu002417803.

15 7. Attached as **Exhibit E** is a true and correct copy of the Copyright Office
16 catalog printout for Copyright No. TXu002390196.

17 8. Public records for JAST (USA) INC. show that it has an entirely
18 separate status as a "stock corporation" with what appears to be different ownership.

19 9. Attached as **Exhibit F** is a true and correct copy of the Articles of
20 Incorporation of a General Stock Corporation for JAST (USA) INC.

21 10. Attached as **Exhibit G** is a true and correct copy of the Articles of
22 Incorporation of a General Stock Corporation for PCR Distributing Co.

23 11. As shown in **Exhibits A, B, C, D, and E**, the Copyright Office catalog
24 does not indicate that any of the alleged copyrighted material is in the form of videos
25 or images.

26 12. I last visited <https://nhentai.net/g/312283/> on January 6, 2025. On that
27 date, this website indicated that the first page of the book "Submission Eternal My

"Lady, My Master," was uploaded 4 years and 8 months ago, i.e., in mid-2020.

13. I last visited <https://nhentai.net/g/208694/> on January 6, 2025. On that date, this website indicated that the first page of the book “Hey...Let’s Do It,” was uploaded 7 years and 3 months ago, i.e., in the fall of 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2025 in Dallas, Texas.

Jennifer M. Rynell

CERTIFICATE OF SERVICE

On January 6, 2025, I filed the foregoing document with the clerk of court for the U.S. District Court, Central District of California via CM/ECF. I hereby certify that I thereby have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and the Local Rules.

~~Jennifer M. Rynell~~